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March 28, 2023

**VIA ECF FILING ONLY**

Hon. Lorna G. Schofield, U.S.D.J.  
United States District Court, SDNY  
500 Pearl Street  
New York, NY 10007

Re: *Powers v. Memorial*; Docket No. 1:20-cv-02625; **Joint Letter Briefly outlining Remaining Disputes**

Dear Judge Schofield:

The letter on remaining disputes was filed as directed on March 24, 2023. (Doc. 440). As requested by this Court, that letter was refiled yesterday, March 27, 2023. (Doc. 447).

The following issues remain in need of judicial resolution:

**I. Plaintiff's exhibits with remaining objections**

1. Consent form: P-290
2. Emails: P-13
3. Medical Histories: P-420, P-515, P-517, P-846
4. Emprint Microwave System guide: P-219, page 2
5. Dr. Coakley radiological images: P-221

**II. Plaintiff's Rule 1006 Summaries**

1. P-915 Summary of hospitalization, surgeries, and procedures
2. P-916 Summary of lab values
3. P-917 Summary of medical billing and billing records at P-968, P-969, P-970, P-971
4. P-919, P-920, P-921 Summaries of Expert

**III. Plaintiff's Demonstratives**

1. PD-8



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Plaintiff wishes to raise the following issues (Defendants cite to the Order resolving each issue):

1. PD-9 (see Doc. 444);
2. Dr. DeMatteo's opinion regarding the causation of the July 4, 2017 embolization (see Doc. 444); and
3. Dr. Coakley's non-cumulative opinion (see Doc. 445).

Respectfully Submitted,

HENDLER FLORES LAW, PLLC

A handwritten signature in black ink, appearing to read 'Scott M. Hendler', written over a horizontal line.

Scott M. Hendler – Pro Hac Vice  
Attorney for Plaintiff

Kaufman Borgeest & Ryan LLP

/s/ Betsy D. Baydala  
Betsy D. Baydala  
Attorney for Defendants